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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IAN VIANU, ELIZABETH BLUM, and
DOMINIC GUTIERREZ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AT&T MOBILITY LLC,

Defendant.

Case No. 3:19-cv-03602-LB

**JOINT NOTICE OF SETTLEMENT AND
STIPULATION AND ~~[PROPOSED]~~
ORDER SUSPENDING CASE DEADLINES
IN LIGHT OF SETTLEMENT**

Judge: Hon. Laurel Beeler

1 Plaintiffs and Defendant AT&T Mobility LLC (“AT&T”) (collectively, the “Parties”), by
2 and through their undersigned counsel, hereby provide the following joint report and stipulate as
3 follows:

4 WHEREAS, the Parties, through mediation with Robert Meyer, Esq. of JAMS, have
5 reached an agreement in principle to settle this case on a class-wide basis, as memorialized in an
6 executed term sheet;

7 WHEREAS, the Parties will be preparing a comprehensive settlement agreement and
8 settlement exhibits, which they anticipate finalizing and filing with the Court, along with
9 Plaintiffs’ motion for preliminary settlement approval, within approximately 60 days; and

10 WHEREAS, in light of the above, the Parties hereby stipulate and respectfully request that
11 the Court:

12 (a) pending the filing of preliminary settlement approval papers, suspend and vacate all
13 existing case deadlines and hearing dates in the case—including those related to AT&T’s motions
14 to stay and to compel arbitration (Dkt. 137, 138; March 17, 2022 hearing date noticed), the case
15 deadlines set by the Court at Dkt. 131, and the Further Case Management Conference scheduled
16 for March 31, 2022;

17 (b) set May 5, 2022 as the date by which preliminary settlement approval papers shall be
18 filed; and

19 (c) set a Further Case Management Conference in this case for June 9, 2022.

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21 IT IS SO STIPULATED.
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1 Dated: March 4, 2022

2 Lieff Cabraser Heimann & Bernstein, LLP
3 By: /s/ Roger N. Heller

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Attorneys for Defendant

~~PROPOSED~~ ORDER

Pursuant to stipulation and good cause appearing, the Court hereby ORDERS as follows:

1. Pending the filing of preliminary settlement approval papers, all existing case deadlines and hearing dates in the case—including but not limited to those related to AT&T's motions to stay and to compel arbitration (Dkt. 137, 138; March 17, 2022 hearing date noticed), the case deadlines set by the Court at Dkt. 131, and the Further Case Management Conference scheduled for March 31, 2022—are suspended and vacated.
2. Preliminary settlement approval papers shall be filed by May 5, 2022.
3. A Further Case Management Conference is set in this case for June 9, 2022 at 9:30 a.m.

IT IS SO ORDERED.

Date: March 7, 2022



Hon. Laurel Beeler
United States Magistrate Judge

1 Pursuant to Civil Local Rule 5-1(i)(3), I, Roger N. Heller, attest under penalty of perjury
2 that concurrence in the filing of this document has been obtained from all signatures.

3 /s/ Roger N. Heller
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